

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

AUG 21 2023

Nathan Ochsner, Clerk of Court

United States of America

v.

Megan Arianne SCHNEIDER

Case No. C-23-638M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 19, 2023 in the county of Kenedy in the
Southern District of Texas, the defendant(s) violated:

Code Section

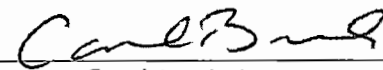
Offense Description

8 United States code 1324

Did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law.

This criminal complaint is based on these facts:

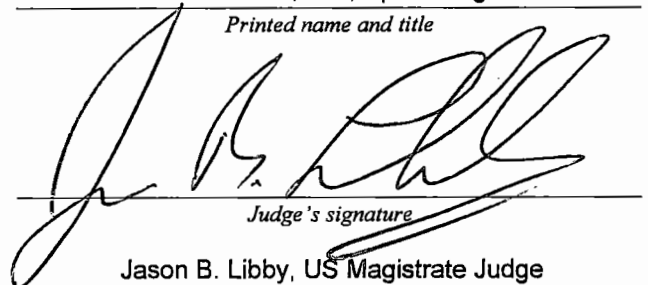
See attached affidavit

☒ Continued on the attached sheet.Submitted by reliable electronic means, sworn to,
signature attested telephonically per
Fed.R.Crim.P. 4.1, and probable cause found:Date: 08/21/2023City and state: Corpus Christi, Texas

Complainant's signature

Carol Burrola, HSI, Special Agent

Printed name and title



Judge's signature

Jason B. Libby, US Magistrate Judge

Printed name and title

AFFIDAVIT

On August 19, 2023, Border Patrol Agent (BPA) James Vera was assigned to the primary inspection lane at the Javier Vega Jr. U.S. Border Patrol Checkpoint. At approximately 8:05pm, BPA Vera observed a blue GMC pickup truck approach the primary inspection lane. The driver of the truck, later identified as Megan Arianne SCHNEIDER, stated she was a United States Citizen after being asked about her immigration status by BPA Vera. BPA Vera looked in the back seat area of the truck and noticed towels on the floor over what appeared to be a person's head. BPA Vera asked for consent from SCHNEIDER to open the door and search the rear seat area. After consent was provided, BPA Vera found a person concealed under the back seat, covered with towels. SCHNEIDER was detained and escorted inside the checkpoint.

While inside the checkpoint, BPA David Bennett determined alienage on the person found under the back seat covered in towels, who was later identified as Pedro Uriel FLORES-Hernandez. FLORES-Hernandez admitted to being illegally present in the United States without proper documentation and citizen of Mexico.

SCHNEIDER was placed under arrest for attempting to smuggle an undocumented non-citizen (UNC) further into the United States. FLORES-Hernandez was kept as a material witness.

Homeland Security Investigations (HSI) Special Agent (SA) Carol Burrola was contacted by Border Patrol and arrived at the Kingsville Border Patrol Station along with SA Kevin Bittner.

SA Burrola read SCHNEIDER her Miranda Rights in her preferred language of English. SCHNEIDER acknowledged she understood her rights and agreed give a statement without the presence of an attorney and signed the Statement of Rights Form.

SCHNEIDER stated the truck she was driving belonged to her mother. SCHNEIDER stated she was coming back from Brownsville, Texas where she went to visit the beach and was driving back to Houston, Texas. SCHNEIDER stated she only visited the beach and pumped gas at a gas station. SCHNEIDER declined making any other stops while in Brownsville. SCHNEIDER stated she was traveling alone with her dog. SCHNEIDER denied knowledge the UNC was in the truck.

SCHNEIDER did not answer all the questions asked to her by SA Burrola. No further information was received.

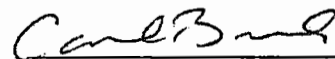
SA Burrola read Pedro Uriel FLORES-Hernandez, a citizen and national of Mexico, his Miranda Rights in his preferred language of Spanish. FLORES-Hernandez stated he understood his rights

and would be willing to make a statement without the presence of an attorney. FLORES-Hernandez stated he entered the U.S. illegally and was illegally present in the U.S. without proper documents.

FLORES-Hernandez stated his aunt made the arrangements for him to be brought into the U.S. illegally and paid a guide \$3,000 U.S. dollars. FLORES-Hernandez crossed the Rio Grande River on Friday August 18, 2023, at around 9:00pm with a group of five (5) UNCs. FLORES-Hernandez was taken to a stash-house and later transported to a second stash-house before being taken by an unknown man to the H-E-B grocery store parking lot in Brownsville, Texas on Saturday August 19, 2023, where he first saw SCHNEIDER.

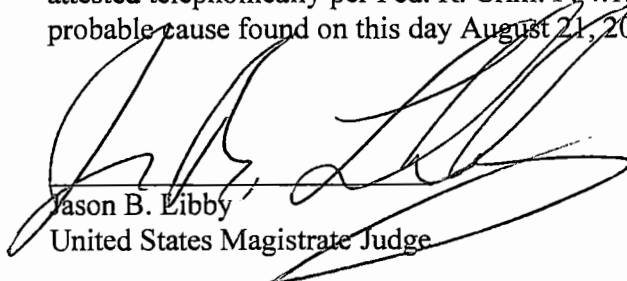
FLORES-Hernandez was able to physically describe SCHNEIDER as a female with her hair shaved off at the sides, tattoos on her neck, and accompanied by her black and gray dog. FLORES-Hernandez was loaded under the back seat of SCHNEIDER's truck and covered in blankets, with SCHNEIDER present. FLORES-Hernandez was told by the unknown man to not make any noise. FLORES-Hernandez stated the driving duration from the time they took off to the time they got to the Border Patrol checkpoint was about an hour. FLORES-Hernandez stated the same driver that he saw when he was loaded into the truck, was the same driver caught at the Border Patrol checkpoint.

SA Burrola contacted AUSA who accepted the case against Megan Arianne SCHNEIDER for violations of Title 8 USC 1324, Alien Smuggling. FLORES-Hernandez was detained as a Material Witness.



Carol Burrola
Homeland Security Investigations
Special Agent

Submitted by electronic means, sworn to, signature
attested telephonically per Fed. R. Crim. P. 4.1, and
probable cause found on this day August 21, 2023:



Jason B. Libby
United States Magistrate Judge